

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
BILLED PARTY PREFERENCE)
FOR 0+ INTERLATA CALLS)
_____)

CC Docket No. 92-77
Phase I

SUPPLEMENTAL COMMENTS OF SPRINT CORPORATION

Pursuant to paragraph 64 of the Commission's Report and Order and Request for Supplemental Comment released November 6, 1992 in the above-captioned proceeding (FCC 92-465), Sprint Corporation ("Sprint"), on behalf of Sprint Communications Co. ("Sprint Communications") and the United Telephone companies, hereby submits its views on a possible system of compensation for operator service providers who transfer 0+ dialed proprietary card calls to the card issuer for completion. Sprint opposes mandatory participation -- either by presubscribed OSPs or card-issuing IXCs -- in any such system of compensation. As will be explained below, imposing such a compensation system, at best, would be premature in light of industry changes that are scheduled to occur in the near future; at worst, it would provide an incentive to presubscribed operator service providers to induce callers to dial 0+, contrary to the instructions given by their card issuers, simply in order to create a new revenue stream for OSPs, ultimately at the expense of the consumer. However, Sprint does not oppose voluntary call transfer and compensation thereof through carrier-initiated tariffs or carrier-to-carrier contracts.

No. of Copies rec'd 076
List Code 00E

Sprint Communications has first-hand experience with the problems and costs of transferring calls to other carriers. As a provider of operator services to the hospitality industry (among others), Sprint is continually confronting the synergistic advantages AT&T possesses by virtue of its former monopoly position in the industry, including an inherited base of calling card customers it has converted in large part to a proprietary card. In the current environment of presubscription of public phones, AT&T's competitors cannot complete calls charged to AT&T's proprietary calling card that are dialed on a 0+ basis (as AT&T has instructed its card holders in the past). Furthermore, since many public phones have blocked the only alternative means of access AT&T has advertised -- its 10XXX code -- AT&T's customers have no practical way of reaching their carrier from phones presubscribed to another carrier, and, understandably, they often register their complaints with hotel management. This, of course, gives AT&T a dual advantage in competing for public phone presubscription: it has a greater volume of commissionable calls than other operator service providers can expect to carry (because of AT&T's greater number of proprietary card holders), and it can use consumers' dissatisfaction with their inability to reach AT&T as another weapon in the fight for presubscription by the premises owner. In order to attempt to mitigate the consumer dissatisfaction problem, Sprint Communications, at considerable expense to itself, has established a call transfer system from certain of its presubscribed hospitality locations to transfer calls placed by AT&T's proprietary card customers to AT&T, at no expense to the customer.

Despite these uncompensated expenses, Sprint believes it would be misguided and unsound for the Commission to mandate a call transfer compensation system at this time. As a result of the Commission's November 6 order in this proceeding, and its earlier orders in CC Docket No. 91-35,¹ significant changes are scheduled to occur within the next few months that, if implemented fully and properly, should substantially diminish the need of proprietary card holders to request that their calls be transferred from the presubscribed operator service provider to the card-issuing carrier. More specifically, in CC Docket No. 91-35, the Commission has established a deadline of January 10, 1993 for unblocking 10XXX 0+ dialing from all pay telephones, and a deadline of March 16, 1993 for unblocking all other public phones for which the cost of unblocking amounts to \$15 or less per telephone line. Thus, in less than four months, 10XXX calls should be unblocked from all payphones and a significant percentage of hotel phones and other public phones. Furthermore, in its November 6 order in this docket, the Commission has required AT&T to commence a program of educating its proprietary card customers to dial 0+ only at locations where AT&T is the presubscribed carrier, and to establish and promote use of a convenient 800 number as an alternative to its 10XXX code.

If these directives are properly implemented, the need for a presubscribed OSP to transfer calls should greatly diminish.

¹Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, 6 FCC Rcd 4736 (1991), on reconsideration, 7 FCC Rcd 4355 (1992).

AT&T's card holders should not be attempting to dial 0+ when AT&T is not the presubscribed carrier for the public phone; AT&T's 10XXX number should be blocked far less often than it is today; and even where AT&T's 10XXX code continues to be blocked, AT&T's customers should be able to use its 800 access number as a convenient alternative. Even though some AT&T customers will undoubtedly continue to dial 0+ on all calls, because of habit or the convenience of dialing fewer digits, the underlying need for call transfers should nonetheless largely disappear.

Furthermore, any Commission-mandated system of compensation for transferred calls could give rise to a new set of problems in the operator service/calling card market segments. In view of the behavior that has occurred among many operator service providers in the past, Sprint would not be at all surprised to see many such carriers encouraging consumers, through signs and tent cards placed on or near public telephones, to dial 0+ for all calls, despite the card issuing carrier's instructions to the contrary, simply in order to tap a new source of revenue. If the card issuing IXCs were required to pay the originating OSP for such transferred calls, the public would ultimately suffer through higher charges for operator service calls.

Moreover, there are serious legal issues that would have to be addressed before the Commission could legitimately require call transfer compensation. Effectuating such compensation simply through the filing of tariffs -- one of the possibilities noted in paragraph 64 -- would accomplish nothing, since the

receiving carrier could not be forced to take service under the tariffs.² The same is true for carrier-to-carrier contracts.

The only basis under the Communications Act for compelling card-issuing IXCs to compensate other OSPs for transferred calls would be under the through route and divisions of charges provisions of Section 201(a) of the Act.³ This course of action would require Commission findings that such action is necessary or desirable in the public interest -- findings that Sprint believes are unsustainable in light of the impending developments in the market discussed above -- and would require the Commission to establish the through rates and divisions of charges between the carriers involved, a highly regulatory solution at a time when the Commission is seeking instead to rely wherever possible on market forces. Moreover, since different OSPs have differing technology and may serve differing types of public phone equipment, the Commission would also be faced with the daunting task of prescribing technical arrangements that are workable for each and every carrier. Such a proceeding would involve examination of costs of possibly hundreds of carriers, and since few carriers today engage in call transfer, the Commission would be dealing

²See, Capital Network Systems Inc., 6 FCC Rcd 5609 (CCB, 1991), review denied, FCC 92-512, released December 2, 1992.

³Another compensation mechanism mentioned by the Commission was "in the nature of the mechanism we recently adopted to compensate private payphone providers for dial-around access code calls....", citing the Commission's Second Report and Order in CC Docket No. 91-35, 7 FCC Rcd 3251 (1992). However, the Commission had special statutory authority in Section 226(e)(2) for prescribing compensation in that narrowly-defined circumstance.

with highly speculative forecasts of what the costs of the transferring carrier amount to.

In short, the only lawful means of imposing a compensation requirement would take a massive commitment of Commission resources at a time when the problem should largely be disappearing. Sprint submits that it would be far preferable for the Commission to follow up on its existing directives to AT&T and the aggregator industry to assure that the root problem does, in fact, diminish as it should. If, after a period of six or nine months, these directives have not been as effective as intended, the Commission could reassess what further actions might be appropriate.

On the other hand, nothing precludes voluntary call transfer compensation systems to be effectuated through the filing of tariffs by the transferring carrier, which could be subscribed to or not, at the option of card-issuing IXCs, or through carrier-to-carrier contracts. So long as participation in the compensation service were not mandatory by card-issuing IXCs, the presubscribed OSPs would not have the incentive, described above, to induce consumers to dial proprietary card calls on a 0+ basis contrary to the card issuer's instructions. The technical terms of the service and the price of the service could be worked out through mutual agreement or marketplace forces. Also, the Commission would not need to be concerned with the other sub-issues for tariffs delineated in the last sentence of paragraph 64, such as cost elements to be recovered, and the cost support to be required for the tariff filings. The voluntary purchasers of service -- card-issuing interexchange carriers -- are

knowledgeable and sophisticated customers and are in a position to decide for themselves whether the transfer services offered by presubscribed OSPs are attractive.

The Commission also sought comment was on how such a transfer service can be provided consistent with the anti-splashing provisions of Section 226(b)(1)(H) of the Act. Under that provision, call transfers can avoid violating that provision of the Act if either (1) the call is handed over to the other carrier at the point of origination of the call, or (2) the OSP transferring the call does so at the customer's request and with the customer's consent after informing the customer that the billing point for the call may be different than the true origination point.

CONCLUSION

Mandatory call transfer compensation is fraught with legal and practical difficulties. By the time these difficulties could be overcome, the number of calls that legitimately need to be transferred should be a mere fraction of today's volume. Rather than embark on such a course, the Commission would better expend its resources seeing to it that the steps it has already taken to reduce blocked or misdialed calls are being implemented in

accordance with its orders in this and other dockets. In the meantime, voluntary transfer compensation, either through tariffs or contracts, should not be precluded.

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December 14, 1992

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